

**PM USA Quality System Document**

<b>Title:</b> Crop Protection Agent/Tobacco Specific Nitrosamines Test Sampling and Control of Sampled Tobacco in TFPP Receiving Stations	<b>Control No.</b> LF-WI-008-004	<b>Page 1 of 9</b>
	<b>Revision No.</b> 03	<b>Approval Date:</b> 03/29/04
<b>Responsible Site/Function:</b> Leaf Quality	<b>Effective Date:</b> 08/01/04	<b>Approved By:</b> Harvey J. Grubbs

**Document Type:**

☐ Policy  
☐ Procedure

☒ Work Instruction  
☐ Other

**1. PURPOSE:**

- 1.1. The purpose of this work instruction is to describe the steps involved in taking samples of tobacco from Selected Producers for Crop Protection Agent (CPA), Tobacco Specific Nitrosamines (TSNA) testing and in controlling sampled tobacco pending the return of test results and disposition.
- 1.2. The purpose of this work instruction also is to assure that:
  - Samples are collected in a consistent manner among all the Receiving Stations,
  - Samples are collected and handled in a way that preserves the integrity of the sample,
  - Sampled tobacco is segregated and tobacco is not shipped to stemmeries until the authorized release for shipment is determined by Philip Morris USA (PM USA) Leaf Quality and communicated in writing to the PM USA Leaf Department personnel at each Receiving Station,
  - Sampled tobacco that is in excess of USDA maximum residue limits for CPA residues is not shipped to stemmeries at all, and is disposed of according to determinations made by PM USA Leaf Quality.

**2. SCOPE:**

- 2.1. This work instruction applies to current crop year tobacco purchased and sampled from Selected Producers in the Tobacco Farmer Partnering Program (TFPP) in both Burley and Flue-Cured tobacco Receiving Stations.  
**Note:** Each stalk position is sampled and tested for each Selected Flue-Cured Producer. The process is performed only once for Selected Burley Producers, but is repeated each time a new stalk position is delivered by Selected Flue-Cured Producers. PM USA Leaf Department personnel are given the total number of samples required from each Receiving Station and when this number is reached the sampling is finished.
- 2.2. This work instruction applies to the PM USA Leaf Department personnel as well as Graders, Quality Supervisors, and/or other PM USA personnel in the Receiving Station.

**3. DEFINITIONS:**

- 3.1. **Crop Protection Agent (CPA):** Includes, but is not limited to, insecticides, herbicides, fungicides, and plant growth regulators used during tobacco cultivation, harvesting, and storage.
- 3.2. **Tobacco Specific Nitrosamines (TSNA):** Includes the products of the nitrosation of naturally occurring tobacco alkaloids.

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- 3.3. **Selected Producer:** Producers who are randomly and selectively identified by the Director of Leaf Quality or the Director's Designee for CPA and TSNA testing.
- 3.4. **Sample Number:** A coded number that identifies a specific sample and its source. For Flue-Cured tobacco, it is composed of the Receiving Station code, Selected Producer's farm number, and the stalk position code. For Burley tobacco, it is composed of the Receiving Station code and the Selected Producer's farm number (see Attachment 2, Sample Number Codes).
4. **RESPONSIBILITIES:**
- 4.1. The PM USA Leaf Department personnel in each Receiving Station are responsible for assigning the Quality Supervisor, or other appropriate PM USA personnel, to perform CPA/TSNA test sampling activities as appropriate.
- 4.2. Graders or Quality Supervisors are responsible for assuring that tobacco is tagged and moved to the CPA Hold Area.
- 4.3. The Quality Supervisor, or other appropriate PM USA personnel, is responsible for sampling and inventorying tobacco for CPA/TSNA testing and for implementing instructions concerning disposition of tobacco on CPA hold and for creating and maintaining records of disposition determinations.
5. **KEY ELEMENTS:**
- Grader or Designee:**
- 5.1. Receive notification from the scanner of the scheduled delivery of current crop year tobacco by a Selected Producer that is to be sampled (see Crop Protection Agent/Tobacco Specific Nitrosamines Sampling and Testing Process LF-PR-008-003). **Note:** Only sample and hold tobacco for the farm selected from current crop tobacco. Do not hold tobacco from other farms associated with that producer or sample old crop tobacco.
- 5.2. Affix colored CPA hold tags to each bale, sheet or container of a Selected Producer's load or assure that Receiving Station personnel affix tags.
- 5.3. Move all bales, sheets, or containers of the Selected Producer's load to the CPA Hold Area in the Receiving Station.
- Quality Supervisor or Designee:**
- 5.4. Take core samples from four or five bales or containers of the Selected Producer's load using the Core-Cat™, the thief tube or hand pull the sample if it is in a sheet.
- NOTE:** Take as many core samples as necessary (approximately four) to get approximately one pound of sample. Randomly select bales or containers and take one core sample from each unit to get as representative a sample as possible. If the load does not consist of a sufficient number of bales or

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containers to sample each unit only once, take as many core samples from each unit as necessary.

- 5.5. Place all core samples from that Selected Producer in the sample bag provided.
- 5.6. Write the sample number on an adhesive label and affix to the sample bag (see Attachment 2, Sample Number Codes).
- 5.7. Complete the Sample Submission Form immediately.
- 5.8. Make a photocopy of the Sample Submission Form, place the copy in the sample bag, fold and staple the bag closed.
- 5.9. Mail or deliver the sample to the testing laboratory at the address provided. File the mailing receipt or write who delivered the sample in the comment section of the CPA/TSNA Test Inventory Form (LF-FO-008-002).  
**NOTE:** When possible, mail or deliver samples the same day they are collected, the next business day at the latest.
- 5.10. Fax the Sample Submission Form to Leaf Quality personnel.
- 5.11. File the Sample Submission Form in the CPA/TSNA Inventory Logbook.
- 5.12. Initiate the CPA/TSNA Test Inventory Form (LF-FO-008-002). Attach a copy of the Bill of Sale for that load to the back of the form.
- 5.13. Inventory tobacco on CPA hold daily. Record daily inventory results on the test inventory form and file the form in the CPA/TSNA Inventory Logbook. Contact Leaf Quality Director, or designee, if any discrepancies are discovered.  
**NOTE:** If a Selected Producer who has tobacco on CPA hold awaiting the return of test results delivers another load of tobacco from the same farm before the results are returned, the tobacco will not be sampled but will be processed into CPA hold status pending receipt of test results.
- 5.14. Receive disposition letter from Leaf Quality authorizing the release of tobacco on CPA hold that have passed testing for shipment to stemmeries. File a copy of the disposition letter.  
**NOTE:** For tobacco with test results showing CPA residues in excess of the USDA maximum residue limits, instructions will be given concerning disposition of that tobacco. Daily inventories must be continued until disposition occurs.
- 5.15. Remove CPA holds in the TFPP system (see TFPP User Manual for Scanner), and CPA Hold tags, for bales, sheets or containers released for shipment to stemmeries.

**6. RECORD REQUIREMENTS:**

- 6.1. Sample Submission Form (CPA/TSNA Inventory Logbook)
- 6.2. CPA/TSNA Test Inventory Form (LF-FO-008-002) with copy of Bill of Sale attached (CPA/TSNA Inventory Logbook)
- 6.3. Sample Mailing Receipts (CPA/TSNA Inventory Logbook) **PM3002956277**
- 6.4. TFPP System Database

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**7. RELATED DOCUMENTS:**

- 7.1. List of Selected Producers and Farms
- 7.2. Crop Protection Agent/Tobacco Specific Nitrosamines Sampling and Testing Process (LF-PR-008-003)
- 7.3. TFPP User Manual for Scanner
- 7.4. A Copy of the Disposition Letter (CPA/TSNA Inventory Logbook)

**8. REVISION HISTORY:**

- 8.1. Description of Change: Revised note under step 2.1. Revised steps 3.1, 3.2, and 3.3 to match the definitions in the Procedure. In section 3.3 added "and selectively identified" and deleted reference to Contract Administration. In 4.2 deleted, "Graders are responsible for entering block codes to place tobacco on CPA/TSNA hold for tobacco to be sampled for CPA/TSNA testing" and added "Graders are responsible for assuring that tobacco is tagged and moved to the CPA/TSNA Hold Area". In step 5.1 added, "from the scanner" and deleted, "inform the grader". Under step 5.1 added note about what to sample and hold. Deleted step 5.2 about entering blocks. Deleted steps 5.3, 5.4, and 5.5 because a producer who has tobacco rejected will have their tobacco sampled and tested. In step 5.5 added, "the thief tube or hand pull the sample if it is in a sheet. In step 5.9 added "or deliver". Removed Contract Administration from the note in step 5.14. and added, "file a copy of the disposition letter".
- 8.2. Reason For Change: Leaf management reviewed the document after system enhancements and suggested the changes be made to reflect actual work practices. The system now automatically blocks farms until they are released by a PM USA employee.

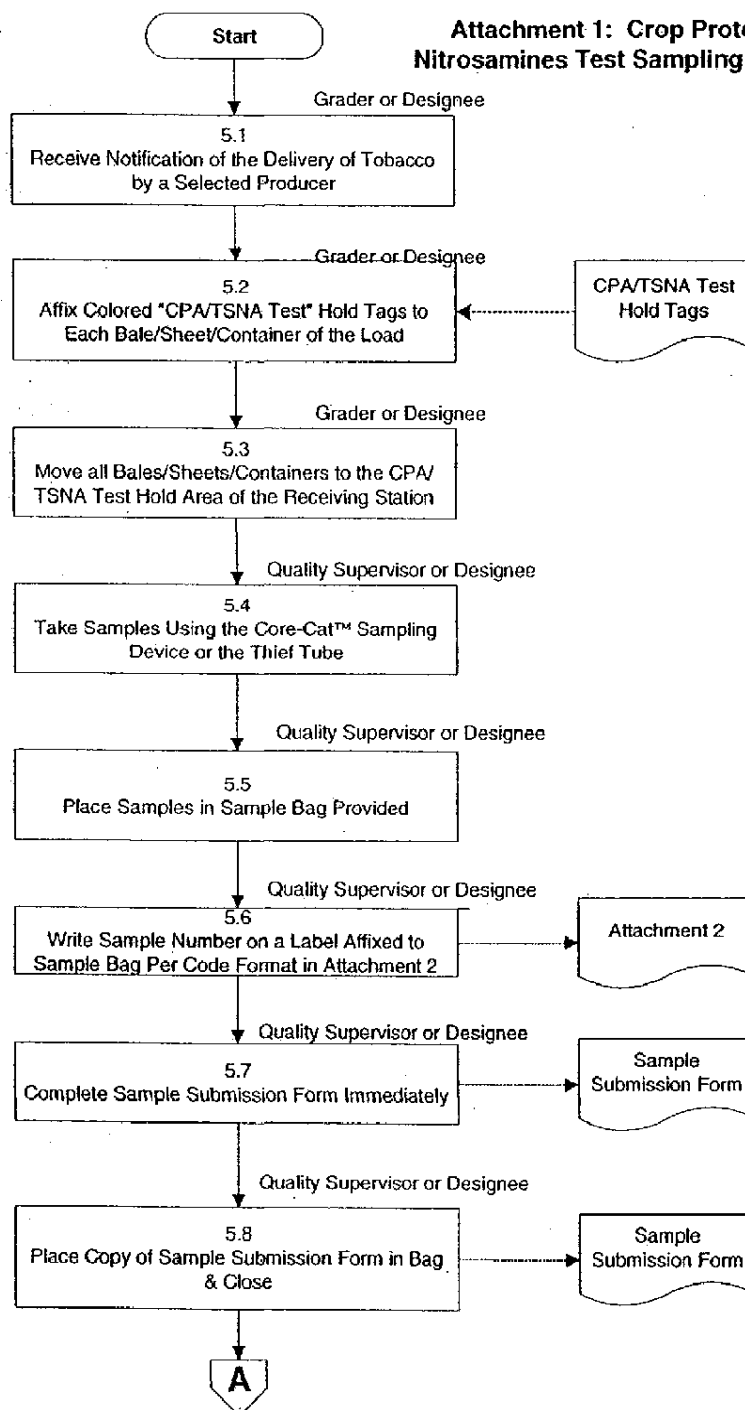
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**Attachment 1: Crop Protection Agent/Tobacco Specific  
Nitrosamines Test Sampling and Control of Sampled Tobacco**



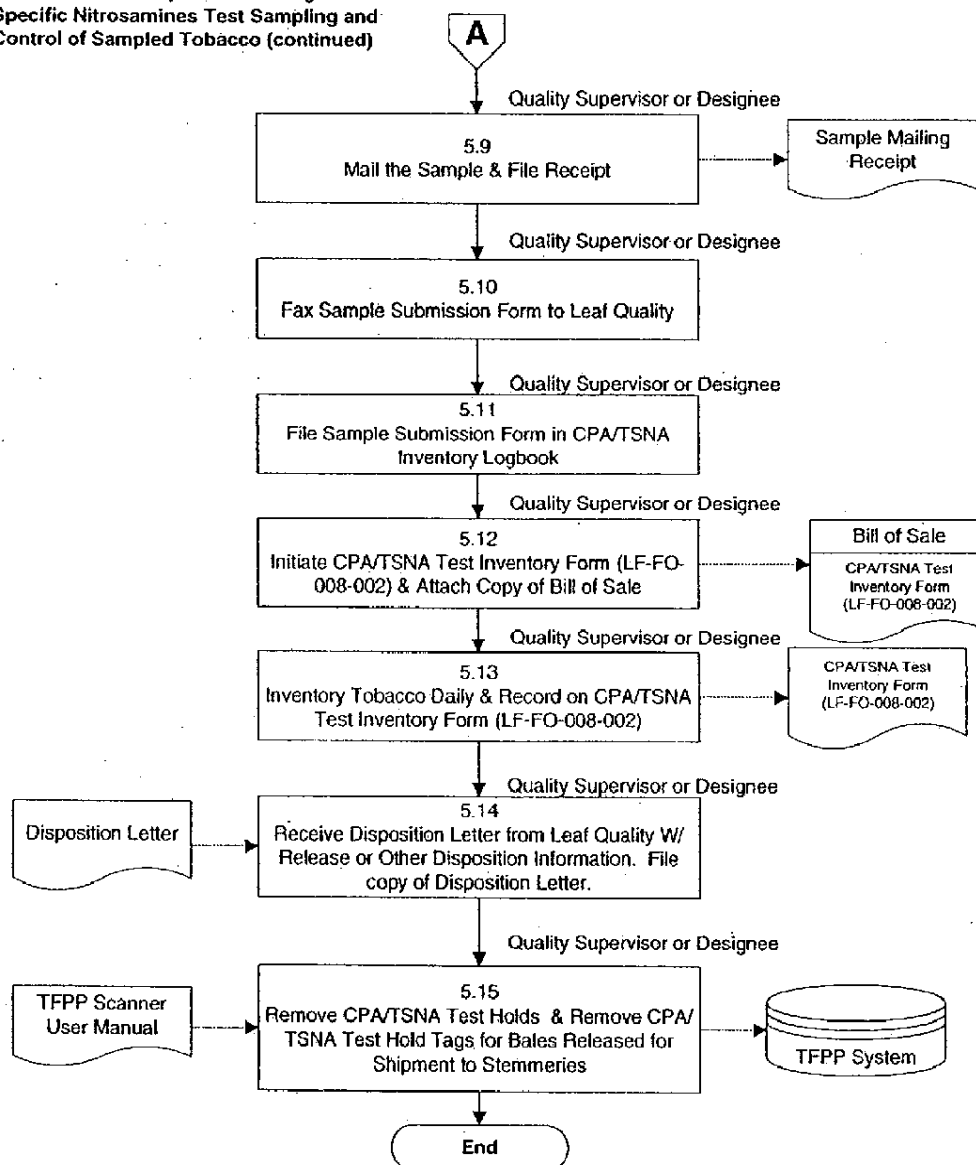
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**Attachment 1: Crop Protection Agent/Tobacco  
Specific Nitrosamines Test Sampling and  
Control of Sampled Tobacco (continued)**



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**Attachment 2: CPATSNA Test Sampling & Control of Sampled Tobacco  
Sample Number Codes****Receiving Station Codes****Flue-Cured Receiving Stations** **Code**

Quality Tobacco Exchange, Inc. – Hahira, GA	001
Georgia/Florida Tobacco Exchange, -- Alma, GA	002
Carolina Tobacco Exchange -- Mullins, SC	003
S & P Tobacco Marketing L.L.C. – Lumberton, NC	004
Central Marketing, Inc. – Smithfield, NC	005
East Carolina Tobacco Contractors – Kinston, NC	006
Tobacco Services L.L.C. – Robersonville, NC	007
Wilson Tobacco Services – Wilson, NC	008
Golden Leaf – South Hill, VA	009
Piedmont Big Sale warehouse – Danville, VA	010
W/S Tobacco Services L.L.C. – Kernersville, NC	011

**Burley Receiving Stations** **Code**

Cozart Warehouses, Inc. – Gray, TN	015
Cozart Warehouses, Inc. – Morristown, TN	016
E. J. Parker L.L.C. – Hartsville, TN	017
General Tobacco Company, Inc. – Hopkinsville, KY	018
Bale Tobacco Marketing, Inc. – Glasgow, KY	019
Bale Tobacco Marketing, Inc. – Elizabethtown, KY	020
Tobacco Services, Inc. – Lebanon, KY	021
London Tobacco Warehouses, Inc. – London, KY	022
Burley Services, Inc. – Lexington, KY	023
Carrollton Tobacco Services – Carrollton, KY	024
King-Burley Warehouses, Inc. – Maysville, KY	025

**Flue-Cured Stalk Position Codes****Stalk Position** **Code**

Primings	01
Lugs	02
Cutters	03
Leaf	04
Tips	05

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**Formats for Sample Numbers**

**Flue-Cured**

**Receiving Station Code – Farm Number – Stalk Position Code**

**Example: 001-1234-01**

**Burley**

**Receiving Station Code – Farm Number**

**Example: 001-1234**

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**ATTACHMENT 3: TFPP Inspection of Tobacco  
QUALITY ISSUES: Block Codes**

The following are tobacco quality issues which may result in tobacco being blocked from further processing when observed before or after purchase. The numbers are Block Codes to be entered in the TFPP system, when appropriate:

<u>Block Code</u>	<u>Quality Issue</u>
01	= High Moisture
08	= High Temperature
15	= Low Density
10	= CPA Testing
18	= Moldy
12	= Non-Tobacco Related Material (NTRM)
13	= Bale Conformance
23	= Black/Carbonized
26	= Contamination (Oil)
21	= Fermented
20	= Funky
03	= Mismatched Tags
04	= Missing Coupon
05	= Missing Belly Tag
02	= Overweight
06	= Underweight
07	= Failed Weight Loss Tolerance
22	= Set Green
14	= Spoiled
19	= Swelled Stems
09	= Unsound/Damaged
16	= Slipsheet Discolored
17	= Slipsheet Torn
24	= Water Damage -- Roof Leak
25	= Water Damage -- Floor
27	= Other

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